



July 15, 2025

VIA ECF

Hon. Katharine H. Parker
U.S. District Court
500 Pearl Street, Room 750
New York, New York 10007

Re: *Sound Around Inc. v. Friedman et al.*
Case No. 1:24-cv-01986-JHR-KHP

Dear Judge Parker:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRE, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Defendants”) in the above-referenced matter. We write in response to Your Honor’s memo endorsement dated July 7, 2025 (ECF Doc. No. 217), directing counsel for the Defendants to provide a further update regarding the status of the production of Defendants’ e-mails and WhatsApp communications.

On July 9, 2025, Defendants produced e-mails communications to opposing counsel in their native format with metadata and, on the morning of July 10, 2025, Defendants produced WhatsApp communications to opposing counsel in their native format with metadata. Both productions were made in a forensically-sound manner.

Thank you for your consideration.

Sincerely,

/s/Nicholas Fortuna

Nicholas Fortuna

cc: All counsel (via ECF)

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